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15 *Ultimate Fighting Championship and UFC*

16
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25 Defendant.
26
27
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No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF ZUFFA'S
POSITION IN THE JOINT MOTION
REGARDING PROTECTIVE
MEASURES FOR THE CLASS
CERTIFICATION AND SUMMARY
JUDGMENT HEARING**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of the Parties’ Joint Motion Regarding Protective
8 Measures for the Class Certification and Summary Judgment Hearing. Based on my personal
9 experience, knowledge, and review of the files, records, and communications in this case, I have
10 personal knowledge of the facts set forth in this Declaration and, if called to testify, could and would
11 testify competently to those facts under oath.

12 3. The Parties anticipate that various materials designated as confidential or highly
13 confidential which were relied on in the briefings on Class Certification and Summary Judgment will
14 be discussed and displayed during the December 14, 2018 hearing before this Court. These
15 materials contain highly confidential financial information, including Zuffa’s financial records and
16 specific financial information regarding Zuffa’s contracts with athletes including payment terms;
17 highly confidential contractual information, including commercially sensitive contract terms and
18 contract strategies; and highly confidential trade secret business information, including commercially
19 sensitive business, acquisition, marketing and negotiation strategies.

20 4. In addition, portions of expert deposition testimony and exhibits will likely be
21 discussed during the hearing which contain highly confidential and commercially sensitive terms,
22 trade secrets, business strategies and specific financial information, including financial information
23 regarding Zuffa’s contracts with athletes.

24 5. With respect to Zuffa’s financial information, it is my understanding that Zuffa, a
25 privately owned company, treats its financial records and financial analysis, revenue, compensation,
26 and other confidential financial information as trade secret information. Disclosure of this
27 information would provide competitors with unfair and damaging insights into Zuffa’s business
28 practices, including providing competitors with unearned competitive advantages.

